

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
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September 14, 1990

Ms. Ellen Greeney
Community Relations Coordinator (6H-MC)
U.S. EPA (6H-MC)
1445 Ross Avenue
Dallas, TX 75202-2733

RE: Arkwood

Ms. Greeney:

This letter presents our comments regarding remedial action alternative selection for the Arkwood site.

We concur that incineration should be the remedy of choice, however, we have the following comments which we hope will be taken into account while finalizing a decision:

1. We share to some degree your "sudden collapse" concern of the underlying limestone formations, but we do not agree that such an occurrence at the site would be catastrophic, in the sense that a large area and a substantial drop would accompany the incident.

My staff contacted Mr. John David McFarland, a geologist with the Arkansas Geological Commission, and Mr. Glenn Laurant who has worked in the area for seven years and is employed by the U.S. Department of Agriculture Soil Conservation Service.

Mr. McFarland, who is a member of the Arkansas Association of Cave Study, reported that caves in the area are the "crawl space type" and are relatively short. He stated that sink holes are rare and when they do occur they are approximately 10' in diameter and the vertical drop at the surface would probably not exceed 3'-4'.

Mr. Laurant reported that his experience in the area indicated that sink holes were rare, 10' or less in surface diameter and accompanied by a vertical surface drop of 2' to 3'.

In situ-vitrification would generate a large area with a very high bearing strength which could receive contaminated soils and allay the "sudden collapse" concern.

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Ms. Ellen Greeney
September 14, 1990
Page 2

After recent meetings with consultants and representatives of Mass Merchandisers (PRP's), we would be amenable to in situ-vitrification as a possible remedial technique, so long as they provide adequate documentation as revisions to the feasibility study to validate applicability at this site.

We feel that sieve and wash certainly should be the first step in the treatment process, and since the actual volumes of material requiring incineration can not be determined at this time, we feel that on-site or off-site incineration should be specified as optional, or the decision held in abeyance until actual quantities are established.

Recent comments and publications, by qualified scientists, including pathologist and toxicologist show a definite direction toward reduced concerns of the adverse health effects of TCDD. EPA is going in the opposite direction by enforcing more stringent clean up standards, as exemplified by their recent modification of the dioxin equivalency rule which resulted in more stringent clean up standards. We would strongly encourage EPA to review the more recent data and expedite an evaluation of their remedial criteria in light of the current information.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gary D. Mathews", followed by a slanted line and the word "for".

Mike Bates
Chief
Hazardous Waste Division
MB:cw